# IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA,		)	No.
		)	
	Plaintiff,	)	COUNT ONE:
		)	Attempted Receipt of Child
	V.	)	Pornography Over the Internet
		)	18 U.S.C. § 2252(a)(2)
ANDREW M. JONES,		)	NLT: 5 Years Imprisonment
[DOB: 11/19/82],		)	NMT: 20 Years Imprisonment
		)	NMT: \$250,000 Fine
Defendar	Defendant.	)	Supervised Release: 5 years to Life
		)	Class C Felony
		)	•
		)	COUNT TWO:
		)	Receipt of Child
		)	Pornography Over the Internet
		)	18 U.S.C. § 2252(a)(2)
		)	NLT: 5 Years Imprisonment
		)	NMT: 20 Years Imprisonment
		)	NMT: \$250,000 Fine
		)	Supervised Release: 5 years to Life
		)	Class C Felony
		)	•
		)	COUNT THREE:
		)	Possession of Child Pornography
		)	18 U.S.C. § 2252(a)(4)
		)	NMT: 10 Years Imprisonment
		)	NMT: \$250,000 Fine
		)	Supervised Release: 5 Years to Life
		)	Class C Felony
		)	<del>-</del>
		)	\$100 Mandatory Special Assessment
		)	Each Count

#### INDICTMENT

#### THE GRAND JURY CHARGES THAT:

#### **COUNT ONE**

Between on or about May 21, 2008, and on or about June 12, 2008, the dates being approximate, in the Western District of Missouri and elsewhere, ANDREW M. JONES, defendant herein, knowingly attempted to receive visual depictions, that is, among others, videos with the following file names: "(Pthc) 6Yo Babyj - Bedtime Rape Until Cum private pedo child girl 1yo 2yo 3yo 4yo 5yo 6yo 7yo vicky laura jenny sofie fdsa hussyfan russian korea.mpg"; "pedo - 4yo girl sucks and eats cum pedo r@ygold hussyfan lolitaguy lsm pthc babyshivid.mpg"; and "Aaaaaaaa 8 yo Boy Butt-Fucks 11 Yo Girl Pthc-!!-New!!-Neighborhood Kids - 10 Yrs Bufing 04-01"; which visual depictions and others had been shipped and transported in interstate and foreign commerce by any means including by computer, and which contained materials which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depictions involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

### **COUNT TWO**

On or about June 20, 2008, the date being approximate, in the Western District of Missouri and elsewhere, ANDREW M. JONES, defendant herein, knowingly received a visual depiction, that is, the video entitled, "Girl Spanked.avi", that had been shipped and transported in interstate and foreign commerce by any means including by computer, and which contained materials which had been shipped and transported in interstate and foreign commerce by any

means including by computer; and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

## **COUNT THREE**

On or about August 11, 2009, in the Western District of Missouri, ANDREW M. JONES, defendant herein, knowingly possessed one (1) or more films, videotapes, and other matter other than the visual depictions supporting Counts One and Two, and which included images of a series involving a girl named "Emma," including but not limited to the visual depiction of this naked prepubescent with her legs spread, depicted in the file named, "100\_0249.jpg," which visual depictions and others had been shipped and transported using any means or facility of interstate or foreign commerce and in or affecting interstate or foreign commerce, and which were produced using materials which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depictions involved the use of minors engaging in sexually explicit conduct, and were visual depictions of such conduct, in violation of Title 18, United States Code, Section 2252(a)(4).

A TRUE BILL.

/s/ Lawrence E. Johnson
FOREPERSON OF THE GRAND JURY

/s/ Katharine Fincham
Katharine Fincham #32570
Assistant United States Attorney

Date: 4/20/11 Kansas City, Missouri